

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**RONALD BOB,**

***Plaintiff,***

**V.**

**NEW CENTURY MORTGAGE  
CORPORATION, DEUTSCHE BANK  
NATIONAL TRUST COMPANY,  
ALTISOURCE SOLUTIONS INC.,  
POWER DEFAULT SERVICES INC.  
AND PHH MORTGAGE  
CORPORATION,**

***Defendants.***



**CIVIL ACTION NO. 4:24-cv-04642**

**DEFENDANTS' MOTION FOR LEAVE TO EXCEED PAGE LIMIT ON  
ITS MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

Defendants Deutsche Bank National Trust Company, as Trustee for Ixis Real Estate Capital Trust 2006-HE2 Mortgage Pass Through Certificates, Series 2006-HE2 (“Deutsche Bank”), Altisource Solutions, Inc. (“Altisource”), Power Default Services, Inc. (“Power Default”), and PHH Mortgage Corporation (“PHH”) (collectively, “Defendants”) hereby bring this motion for leave to exceed the page limit on its motion to dismiss Plaintiff Ronald Bob’s (“Plaintiff”) Complaint (Doc. 1-1). In support of this motion, Defendants state:

1. On October 29, 2024, Plaintiff filed his Original Petition, in the 295<sup>th</sup> Judicial District Court of Harris County, Texas (the “Complaint”), bringing suit against Defendants seeking to overturn a completed foreclosure sale of real property located at 4010 Cypress Hill Drive, Spring, TX 77388 (the “Property”) and to recover damages. *See* (ECF No. 1-1, Pg. ID # 5-93). Plaintiff’s Complaint is 26 pages long and states the following causes of action against Defendants:

- a) wrongful foreclosure
- b) breach of contract
- c) fraud
- d) violations of RESPA (12 U.S.C. § 2605)
- e) lack of standing to foreclose
- f) violations of the Fair Debt Collections Practices Act (FDCPA)
- g) “Scheme to Defraud” or Truth in Lending Act violations
- h) violation of 42 U.S.C. § 1983, et seq.
- i) criminal conspiracy under 18 U.S.C. § 241
- j) slander of title
- k) slander of credit; and
- l) infliction of emotional distress

2. Defendants removed the case to federal court and were granted permission to file a Motion to Dismiss on April 3, 2025 (Order, ECF No. 20).

3. Under the Judge Hanks’ Court Procedures, absent leave of court, any motion or memorandum of law shall be limited to 25 pages. Courtroom Procedure § 7(A).

4. Because Plaintiff has asserted twelve (12) causes of action in his Complaint, Defendants estimate they will need 30-35 pages of briefing to be able to fully respond to all of Plaintiff’s allegations and causes of action contained in its Complaint.

5. Defendants hereby move to court for leave to allow Defendants’ Motion to Dismiss Plaintiff’s Complaint to exceed the 25 page limit. Defendants specifically requests that the Court allow a 35-page limit for this motion to dismiss. Counsel for Defendants attempted to conferred with Plaintiff via e-mail, on May 14, 2025, regarding the requested relief. Plaintiff has

not responded to Defendants' request to confer and so Defendants presume that Plaintiff is opposed to leave for Defendants to exceed to 25-page limit allowed under Judge Hanks' Court Procedures.

WHEREFORE, PREMISES CONSIDERED, Defendants pray that this Court grant its motion and allow Defendants' Motion to Dismiss Plaintiff's Complaint to exceed the page limit, but be no longer than 35 pages in length. Defendants further move that the Court grant such other relief as may be deemed appropriate.

Respectfully submitted,

By: /s/ Thomas W. White, Jr.

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**THOMAS W. WHITE, JR.**

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**ATTORNEYS FOR DEFENDANTS**

### **CERTIFICATE OF CONFERENCE**

I, Thomas White, counsel for Defendant, do hereby certify that on May 14, 2025, I emailed Plaintiff, Ronald Bob regarding Defendants' intent to file a motion for leave to exceed the page limit on its motion to dismiss Plaintiff's complaint, and asked if Plaintiff was opposed or unopposed. Mr. Bob did not respond to my email so I presume he is opposed to this Motion.

By: /s/ Thomas W. White, Jr.

Thomas W. White, Jr.

**CERTIFICATE OF SERVICE**

I hereby certify that on May 15, 2025, a copy of the above and foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing has been forwarded to all parties, by and through their attorneys of record, by operation of the Court's electronic filing system or by other means in accordance with the FEDERAL RULES OF CIVIL PROCEDURE.

**Via First Class Mail, Email and Certified Mail Return Receipt Requested**

Ronald Bob  
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***Plaintiff Pro Se***

/s/ Thomas W. White, Jr.  
**THOMAS W. WHITE, JR.**